January 25, 2002
Rev. 1

Attention: Minerals Management Service
(MMS) Interior

Subject: Oil, Gas and Sulphur Operations in the Outer Continental Shelf
proposal to add API 510.

Gentlemen;

Please be advised that the "best available and safest technologies" are being used at this time in the Gulf of Mexico. The best-trained inspectors verifying the original Code of Construction, repair and alterations are National Board Commissioned Inspectors and/or National Board Owner-User Commissioned Inspectors holding an A and/or B endorsement, even a N (Nuclear) endorsement will do. These inspectors witness New ASME Code construction as well as repairs and alterations to said ASME Code Items.

The proposed rule change document "MMS's Review Concerning Pressure Vessels" states that ASME does not address maintenance inspection, rating, repair and alterations of pressure vessels (Code Items) after the Code Item is placed into service. The National Board Inspection Code (NBIC); an Internationally recognized American National Standard, references ASME throughout the NBIC. Part RC-1020 of the NBIC states that the ASME Code shall be used insofar as possible, to the Section and Edition of the ASME Code most applicable to the repair or alteration planned. Part RB of the NBIC "Inservice Inspection of Pressure Retaining Items" specifically deals with inservice inspections referencing the ASME Code. How can you say that the NBIC is a generic code.

The MMS's review concerning pressure vessels is misleading. API 510 inspectors are not familiar with new Code Item construction; how can they do a better job of inspection than a Authorized National Board Commissioned Inspector who has full knowledge of new construction, repair and alteration requirement per the original Code of Construction, access to the relevant Code of Construction Books and the NBIC.

I take issue with your insistence that API 510 is the best available and safest technology. As a Authorized National Board Commissioned Inspector with both an A and B endorsement; working for Contract Inspection Services {OneBeacon Insurance Co. (was Commercial Union Ins. Co.s)} have witnessed API 510 being used in the offshore waters of the Gulf of Mexico. I know that at this time and in this case API 510 is not acceptable and that no one would do any thing without the consent of the Jurisdiction, however I will tell you what I have seen.

In the Gulf of Mexico the API 510 guys are usually Nondestructive Examination Personnel with the API 510 inspection credentials. I; along with one of my "R" Certificate Holders(Repair organization) serviced, reviewed and corrected more than one de-rate of a ASME Code Pressure Vessel which 510 guys assumed that the material grade could not be verified. The 510 guys; when they can't find material identifications, assume a carbon steel worse case scenario of SA36 material stress valves used in calculating a de-rate (Not all Code Items are constructed of carbon P1 materials). This greatly reduced the working pressure of the vessel. More than once the Offshore Production Facilities have called use and we go. In most cases, after less than one hour I find the original material grade stampings of SA516-70 or what ever it may be for the heads and shell; which matched the original pressure rating requirements, documentation, prints and/or the original Manufacture Data Report, most of which are found on board and confirmed that the pressure vessels met the Code of Construction requirements.

On other occasions, one Code shops with additional Repair Certificates along with myself have had to fix this use of best available and safest 510 technologies. Problems ranged from the original Code of Construction as not of concern, using non qualified welding procedures and welders, lack of Post Weld Heat Treatment or Alternative Methods to Post Weld Heat Treatment, use of non code materials, wrong calculations, use of unacceptable weld joint not allowed by the Code of Construction to a lack of impact material and impact weld requirements just to name a few.

If you want quality inservice maintenance and the best available inspections for plant or production facility (on or offshore) it must have a good corrosion program and a good quality control program or someone else who does. A good program will use qualified and competent National Board Commissioned Inspectors with the proper endorsements who are familiar with the Code Items, Code of Construction and how to repair or alter the inservice pressure vessels when needed.

As you can tell I do not like API 510. The API 510 inspector examination takes less than 6 hours to complete; lets say 8 hours. The National Board Commission Inspectors examination with endorsement tests takes 16 hours with access to all of the ASME and NBIC Code Books. The API 510 guys do cost much less than a qualified commissioned inspector, maybe that's the problem? You tell me when your offshore in the middle of the Gulf around low or high pressure vessel equipment with oil, gas, condensate and water, that needs to be repaired, altered or has been. Which of the two above would you think is the safest and best available.

Sincerely,

John M. Baggett
CIS/OneBeacon America Insurance Co.
Codes and Standards Inspector
NB# 11527AB; LA1209, TX 1494, MISS 3405